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7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 Alexis Wakefield,
9 Plaintiff,
10 v.
11 Jessica Saldana and Ronnie J. Saldana; DOES
12 1 through 10; ROE CORPORATIONS 11
through 20, inclusive,
13 Defendant.

Case No. 2:22-cv-00402

ORDER GRANTING
**Proposed Stipulation to Continue
Discovery Deadlines (Rebuttal Expert
Reports)**
(Second Request)

14 Plaintiff, ALEXIS WAKEFIELD, by and through her attorney of record, BRIAN K.
15 HARRIS, ESQ. with the law firm of HARRIS & HARRIS INJURY LAWYERS, and
16 Defendants, JESSICA SALDANA and RONNIE J. SALDANA, by and through their
17 attorneys of record MICHAEL A. PINTAR, ESQ. with the law firm of MCCORMICK,
18 BARSTOW, SHEPPARD, WAYTE & CARRUTH, hereby files this Stipulation and Order
19 to Continue Discovery Deadline (Rebuttal Expert Reports) (Second Request), specifically
20 seeking to extend the due date for the rebuttal expert reports by one week.

21 IT IS HEREBY STIPULATED AND AGREED between the parties to extend the
22 rebuttal expert reports deadline of November 2, 2022. In accordance with Local Rule 26-4,
23 the parties state as follows:

24 **A. Discovery Completed**

25 Plaintiff served her Initial Disclosures on May 4, 2022 and Defendants served their
26 Initial Disclosures on May 4, 2022. The parties have supplemented these responses
27 appropriately as new information becomes available. Plaintiff has propounded
28 interrogatories, requests for admissions and requests for production of documents to

1 Defendants. Defendants and propounded interrogatories and requests for production of
2 documents to Plaintiff. Defendant has taken the deposition of Plaintiff on July 12, 2022.
3 Initial expert reports were served on October 3, 2022.

4 **B. Discovery Remaining**

5 The parties intend to depose experts that were disclosed as well as the Defendants
6 depositions.

7 **C. Need for Extension of Discovery Plan**

8 The parties have been working diligently throughout the discovery process. As
9 indicated above, the parties have begun discovery efforts in terms of disclosures, written
10 discovery, and depositions. Plaintiff's request additional time for their expert rebuttal report
11 by one week.

12 **D. Proposed New Discovery Schedule**

13 **1. Discovery Cutoff date:** Discovery cutoff currently scheduled for **November 30, 2022**, no change.

14 **2. Expert Disclosures:** Initial expert disclosures were served on October 3, 2022.

15 **3. Rebuttal Disclosures:** Rebuttal Disclosures are due on **November 2, 2022**, shall
16 be served on **November 7, 2022**.

17 **4. Dispositive Motions:** Dispositive motions currently due **December 30, 2022**, no
18 change.

19 **5. Pretrial Order:** A Joint Pretrial Order shall be filed by **January 30, 2023**, which is
20 30 days after the deadline for filing dispositive motions. However, if any dispositive
21 motions are filed, then the Joint Pretrial order shall be due 30 days after decision on such
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1 motion(s). Disclosures under Fed. R. Civ. P. 26(a)(3) and any objections thereto shall be
2 included in the Joint Pretrial order.

3 Respectfully submitted this 31st day of October, 2022.

4 HARRIS & HARRIS LAWYERS

5 /s/ Brian K. Harris
6 Brian K. Harris, Esq.
7 1645 Village Center Circle, Suite 60
8 Las Vegas, Nevada 89134
9 *Attorneys for Plaintiff Alexis Wakefield*

MCCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH, LLP

/s/ Michael A. Pintar
Michael A. Pintar, Esq.
201 W. Liberty Street, Suite 320
Reno, Nevada 89501
10 *Attorneys for Defendant Jessica & Ronnie
11 Saldana*

12 **IT IS SO ORDERED:**

13 DATED this 3rd day of November, 2022.



14 **UNITED STATES MAGISTRATE JUDGE**

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